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17 Attorneys for Plaintiff Stanmore C. Cooper

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 STANMORE C. COOPER,) No. C 07-1383 VRW
23 Plaintiff,)
24 v.)
25 FEDERAL AVIATION)
ADMINISTRATION; SOCIAL SECURITY)
26 ADMINISTRATION; UNITED STATES)
DEPARTMENT OF TRANSPORTATION,)
27)
28 Defendant.

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES**

1

2 **STIPULATION**

3 1. Pursuant to the parties' stipulation, on January 28, 2008, the Court set the deadline for
 4 expert discovery as May 28, 2008. On March 10, 2008, pursuant to the parties' stipulation, the
 5 Court extended the deadline for filing dispositive motions to May 1, 2008, extended the last day
 6 for hearing on dispositive motions to June 5, 2008, and continued the pretrial conference to
 7 August 7, 2008.

8 2. Plaintiff filed a motion for partial summary judgment on April 28, 2008. Defendants filed
 9 a motion for summary judgment on May 1, 2008.

10 3. On May 8, 2008, the Court continued the hearing date for the parties' cross motions for
 11 summary judgment from June 5, 2008 to June 12, 2008, at 2:30 p.m.

12 4. Defendants' counsel are not available on June 12, 2008. The parties have reviewed the
 13 Court's website for a list of available hearing dates. Given the unavailability of defendants'
 14 counsel on June 12, 2008, the parties respectfully stipulate to continue the hearing date for the
 15 parties' cross motions for summary judgment to August 21, 2008, at 2:30 p.m., and to continue
 16 the pre-trial conference in this matter to October 16, 2008. The parties further stipulate to extend
 17 the deadline for expert discovery to September 30, 2008.

18 IT IS SO STIPULATED.

19 DATED: May 9, 2008

Respectfully submitted,
 JOSEPH P. RUSSONIELLO
 United States Attorney

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22 _____ /s/ Jennifer S Wang _____
 23 JENNIFER S WANG
 Assistant United States Attorney

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DATED: May 9, 2008

25 REED SMITH, LLP

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27 _____ /s/ James M. Wood _____
 28 JAMES M. WOOD
 TIFFANY RENEE THOMAS
 Attorneys for Plaintiff Stanmore C. Cooper

1 ~~[PROPOSED]~~ ORDER
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3 Pursuant to the parties' stipulation and good cause having been shown, it is ordered that:

4 1. The hearing on the parties' cross motions for summary judgment is continued to August
5 21, 2008, at 2:30 p.m.
6 2. The pre-trial conference is continued to October 16, 2008, at 3:30 p.m.
7 3. The expert discovery cut-off is extended to September 30, 2008.

8
9 IT IS SO ORDERED.

10 DATED: 5/12/08

